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STIPULATION AND [PROPOSED] ORDER EXTENDING INITIAL DISCLOSURE DEADLINE (Case No. 19-CV-00051-JLR) - 1

THE HONORABLE JAMES L. ROBART

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

PATRICIA WOODELL, individually and on behalf of all others similarly situated,

Plaintiff.

VS.

EXPEDIA, INC., EAN.COM, LP, TRAVELSCAPE, LLC and HOTELS.COM L.P.,

Defendants.

Case No. 19-cv-00051-JLR

STIPULATION AND <del>[PROPOSED]</del> ORDER CONTINUING INITIAL DISCLOSURE DEADLINE

NOTE ON MOTION CALENDAR: MARCH 25, 2019

The parties in the above-captioned action, through their undersigned counsel, hereby STIPULATE AND AGREE as follows:

- 1. Pursuant to the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. No. 12), initial disclosures are due March 26, 2019.
- 2. The parties have requested a conference with the Court regarding Defendants' request to stay discovery and deadlines pending the Court's ruling on its motion to dismiss, which has been set for March 26, 2019. The parties have conferred and agree that more time is warranted to prepare initial disclosures in light of Defendants' request for a stay.

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3. The parties therefore stipulate and agree to request that the Court continue the 1 deadline to exchange initial disclosures for two weeks, to April 9, 2019. 2 SO STIPULATED. 3 4 Dated this 25th day of March, 2019. 5 CALFO EAKES & OSTROVSKY PLLC 6 By s/Angelo J. Calfo Angelo J. Calfo, WSBA# 27079 7 Emily Dodds Powell, WSBA# 49351 1301 Second Avenue, Suite 2800 8 Seattle, WA 98101 (206) 407-2200 | Phone 9 (206) 407-2224 | Fax 10 Email: angeloc@calfoeakes.com emilyp@calfoeakes.com 11 Attorneys for Defendants Expedia, Inc., EAN.com, LP, 12 Travelscape, LLC and Hotels.com L.P. 13 HAGENS BERMAN SOBOL SHAPIRO LLP 14 By s/ Steve W. Berman Steve Berman, WSBA# 12536 15 Andrew Volk, WSBA # 27639 16 1301 Second Avenue, Suite 2000 Seattle, WA 98101 17 (206) 623-7292 | Phone (206) 623-0594 | Fax 18 Email: steve@hbsslaw.com andrew@hbsslaw.com 19 MCGOWAN, HOOD & FELDER, LLC 20 21 James L. Ward, Jr. Ranee Saunders 22 321 Wingo Way, Suite 103 Mt. Pleasant, SC 29464 23 (843) 388-7202 | Phone (843) 388-3194 | Fax 24 Email: jward@megowanhood.com rsaunders@mcgowanhood.com 25

STIPULATION AND [PROPOSED] ORDER EXTENDING INITIAL DISCLOSURE DEADLINE (Case No. 19-CV-00051-JLR) - 2

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STIPULATION AND [PROPOSED] ORDER EXTENDING INITIAL DISCLOSURE DEADLINE (Case No. 19-CV-00051-JLR) - 3

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PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 26 day of March, 2019

UNITED STATES DISTRICT JUDGE

STIPULATION AND [PROPOSED] ORDER EXTENDING INITIAL DISCLOSURE DEADLINE (Case No. 19-CV-00051-JLR) - 4

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